



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP:ICR/JEA  
F. #2020R00508

*271 Cadman Plaza East  
Brooklyn, New York 11201*

September 23, 2021

By ECF

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Colinford Mattis and Urooj Rahman  
Criminal Docket No. 20-203 (BMC)

Dear Judge Cogan:

The government respectfully submits this letter to advise the Court that the defendants have each advised the government that they will accept the government's plea offer.

Accordingly, the government requests that the Court schedule an in-person change of plea hearing at the earliest available opportunity, and order that the pretrial motions filed by the defendants on September 17, 2021, be held in abeyance while the case is resolved. The defendants consent to these requests. The government further requests that the Court take the defendants' pleas itself, in lieu of referring them to a magistrate judge. The parties are all available for in-person change of plea hearings in the afternoon on October 7, 2021, and the government understands that the Court is also available to take the defendants' pleas at that time.

Finally, the parties request that the Court exclude time under the Speedy Trial Act until the date set by the Court for the defendants' change of plea hearing. Specifically, the parties request that the Court find that the ends of justice served by ordering the requested continuance, particularly because the parties have reached an agreement to resolve this case

without trial, outweigh the best interests of the public and the defendants' right to a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

JACQUELYN M. KASULIS  
Acting United States Attorney

By: /s/Ian C. Richardson  
Ian C. Richardson  
Jonathan E. Algor  
Assistant U.S. Attorneys  
(718) 254-7000

Cc: Clerk of the Court (BMC) (by ECF)  
Sabrina P. Shroff, Esq.  
Paul Shechtman, Esq.  
Peter W. Baldwin, Esq.